

EXECUTIVE SUMMARY

Final Report: Virginia Child and Family Services Review

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Virginia. The CFSR assesses State performance with regard to seven child welfare outcomes pertaining to children's safety (two outcomes), permanency (two outcomes), and well being (three outcomes), and seven systemic factors relevant to the State's ability to achieve positive outcomes for children who come into contact with the child welfare system. The Virginia CFSR was conducted the week of July 7, 2003 with an additional case review for Item 5 (Foster Care Re-Entries) conducted on March 16 and 17, 2004. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency – the Virginia Department of Social Services (DSS);
- The State Data Profile, prepared by the Children's Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 1999 through 2001;
- Reviews of 50 cases (both foster care and in-home services cases) at three sites in the State;
- Reviews of 115 foster care cases for Item 5 at three sites in the State; and
- Interviews or focus groups (conducted at all three sites and at the State-level) with stakeholders including, but not limited to, children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys.

A key finding of the Virginia CFSR is that the State is in substantial conformity with Well Being Outcome 2 (Children receive appropriate services to meet their educational needs). This outcome was determined to be substantially achieved in 92.3 percent of the cases reviewed, which exceeds the 90 percent required for substantial conformity. CFSR case reviews found that DSS made concerted efforts to address children's educational needs in both foster care and in-home services cases.

One area of concern with regard to the State's performance on the child and family outcomes pertained to Permanency Outcome 1 (Children have permanency and stability in their living situations). This outcome was determined to be substantially achieved in only 37 percent of the cases reviewed. Although performance on this outcome was fairly low in the three sites included in the onsite CFSR, there was substantial variation in performance across sites. The outcome was determined to be substantially achieved in 71 percent of Bedford County cases, compared to 42 percent of Fairfax County cases and no Norfolk City cases.

The case-review findings, as well as data from the State Data Profile, indicate that DSS is not effective in establishing appropriate permanency goals (Item 7) and achieving those goals in a timely manner (Items 8 and 9). Stakeholders and case reviewers identified both court-related and agency-related barriers to attaining permanency in a timely manner. Court-related barriers were overcrowded dockets, continuances, and a lengthy appeals process for termination of parental rights (TPR). Agency-related barriers included delays

in completing paperwork and filing for TPR, failure to discuss adoption fully with children and foster parents, and a lack of consistency in providing adoption counseling to children who voice concern about adoption.

Another area of concern pertained to Well Being Outcome 1 (Families have enhanced capacity to provide for their children's needs). This outcome was determined to be substantially achieved in only 66.0 percent of the cases reviewed and all indicators for the outcome were rated as Areas Needing Improvement. Again, although performance on this outcome was low in the three CFSR sites, there were cross-site differences. The outcome was determined to be substantially achieved in 83 percent of Fairfax County cases, compared to 53 percent of Norfolk City cases and 50 percent of Bedford County cases. CFSR case review findings indicate that DSS was not consistent in its efforts to assess and meet the services needs of children, parents, and foster parents; involve parents and children (when relevant) in the case planning process; and establish face-to-face contact with parents and children with sufficient frequency to ensure children's safety and promote their well-being.

With regard to the systemic factors assessed through the CFSR, Virginia achieved substantial conformity with the systemic factors of Statewide Information System, Quality Assurance, and Agency Responsiveness to the Community. The State did not achieve substantial conformity with the systemic factors of Case Review System; Training; Service Array; or Foster and Adoptive Parent Licensing, Recruitment, and Retention. The following are some of the key concerns identified in the assessment of systemic factors: (1) parents are not routinely involved in the case-planning process; (2) the State does not have mandated training for all new workers or for foster parents and does not have a State-mandated program of ongoing training for caseworkers or foster parents; (3) the status of each child in foster care is not reviewed at least once every six months on a consistent basis across the State in accordance with Federal requirements; and (4) the agency is not seeking TPR in accordance with the provisions of the Adoption and Safe Families Act (ASFA) in a consistent manner.

The findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance relative to the national standards, and table 4 provides information pertaining to the State's substantial conformity with the seven systemic factors assessed through the CFSR.

I. KEY FINDINGS RELATED TO OUTCOMES

Safety Outcome 1: Children are first and foremost protected from abuse and neglect.

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (Item 1) and the other relates to the recurrence of substantiated or indicated maltreatment for the same children (Item 2).

Virginia did not achieve substantial conformity with Safety Outcome 1. This determination was based on the finding that the outcome was substantially achieved in 85 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity. However, the State did meet the national standards for (1) the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a six-month period; and (2) the percentage of children maltreated while in foster care. The criteria and standards for all three measures must be met for the State to achieve substantial conformity with this outcome.

A key case review finding is that DSS was not consistent with regard to initiating investigations of maltreatment reports and/or establishing face-to-face contact with the children who were the subject of the maltreatment reports in accordance with the timeframes established by the State or local agency. Case reviewers determined that in these cases, children were not sufficiently protected from abuse or neglect. In addition, although both case review findings and data from the State Data Profile indicate a low incidence of recurrence of substantiated maltreatment reports within a six-month period, the Statewide Assessment reports that maltreatment reports received on open cases are not routinely subjected to a formal investigation and that this practice varies across the State. As a result, it is difficult to determine the actual rate of maltreatment recurrence.

Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate.

Performance relevant to Safety Outcome 2 is assessed through two indicators. One indicator (Item 3) addresses the issue of the agency's efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (Item 4) pertains to the agency's effectiveness in reducing the risk of harm to the child.

Virginia did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 81.3 percent of the cases reviewed, which does not meet the 90 percent required for substantial conformity.

One finding of the CFSR case reviews was that DSS made concerted efforts to provide services to families to protect children in the home and prevent their removal. However, case reviewers also determined that in 19 percent of the applicable cases, the DSS response was not adequate to reduce the risk of harm to the child. In several cases, reviewers noted that there was no safety assessment or the safety assessment was not sufficiently comprehensive to capture critical family issues relevant to the child's safety, such as domestic violence and mental illness.

Permanency Outcome 1: Children have permanency and stability in their living situations.

There are six indicators incorporated in the assessment of Permanency Outcome 1, although not all are relevant for all children. The indicators pertain to the agency's efforts to prevent foster care re-entry (Item 5), ensure placement stability for children in foster care (Item 6), and establish appropriate permanency goals for children in foster care in a timely manner (Item 7). Depending on a child's permanency goal, the remaining indicators focus on the agency's efforts to achieve permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (Items 8 and 9), or whether the agency is effective in ensuring that children who have other planned living arrangements are in stable placements and adequately prepared for eventual independent living (Item 10).

Virginia did not achieve substantial conformity with Permanency Outcome 1. This was based on the following findings:

- The outcome was substantially achieved in 37 percent of the cases, which is less than the 90 percent required for a determination of substantial conformity.
- The State Data Profile indicates that for fiscal year (FY) 2001, the State did not meet the national standard for (1) the percentage of children who were reunified within 12 months of entry into foster care; (2) the percentage of children who were discharged to finalized adoptions within 24 months of entry into foster care; and (3) the percentage of children who experienced no more than two placement settings after having been in foster care for 12 months or less.

However, the State Data Profile indicates that for FY 2001, the State did meet the national standard for the percentage of children entering foster care who were re-entering within 12 months of a prior foster care episode.

There was considerable variation in performance on this outcome across CFSR sites. The outcome was determined to be substantially achieved in 71 percent of Bedford County cases, compared to 42 percent of Fairfax County cases and no Norfolk City cases.

The results of the case reviews and the data provided in the State Data Profile suggest that DSS does not consistently make concerted efforts to (1) ensure children's placement stability while in foster care; (2) establish appropriate permanency goals in a timely manner;

(3) reunify children in a timely manner; and (4) achieve finalized adoptions in a timely manner. Stakeholders and case reviewers identified both court-related and agency-related barriers to attaining permanency in a timely manner. Court-related barriers included overcrowded dockets, continuances, and a lengthy appeals process for termination of parental rights (TPR). Agency-related barriers included delays in completing paperwork and filing for TPR, failure to fully discuss adoption with children and foster parents, and a lack of consistency in providing adoption counseling to children who voice concern about adoption.

Although data in the State Data Profile indicate that in FY 2001 Virginia met the national standard for the percentage of children re-entering foster care within 12 months of a prior episode, the initial case reviews found that in one (17%) of the six applicable cases, the child's entry into foster care during the period under review was within 12 months of discharge from a prior foster care episode and the re-entry was due to the same reason that originally brought the child into care. The criteria and standards for both measures must be met for this indicator (Item 5) to be rated as a Strength. As requested by the State, an additional review of cases was conducted in order to address the difference between the results of the original onsite case review and the State's aggregate data for this measure. The additional case review of 115 cases conducted for Item 5 resulted in two cases being rated as Areas Needing Improvement while the balance of cases were rated as Strengths. Therefore, Item 5 is rated as a Strength because 98 percent of the 121 applicable cases were rated as Strengths, in addition to the State's data meeting the national standard related to this item.

Permanency Outcome 2. The continuity of family relationships and connections is preserved for children.

Permanency Outcome 2 incorporates six indicators that assess agency performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (Item 11); (2) placing siblings together (Item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (Item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (Item 14); (5) seeking relatives as potential placement resources (Item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (Item 16).

Virginia did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 70.3 percent of the cases, which is less than the 90 percent required for substantial conformity.

Performance with respect to achieving Permanency Outcome 2 varied across CFSR sites. Case reviewers determined that this outcome was substantially achieved in 92 percent of Fairfax County cases, compared to 57 percent of Bedford County cases and 50 percent of Norfolk City cases.

CFSR findings indicate that DSS makes concerted efforts to place children in close proximity to their families and to place siblings together in foster care. However, case reviewers determined that the agency is not consistent in its efforts to preserve connections between children and their families through frequent visitation or other forms of contact. In addition, case review findings indicate that DSS is not consistent in its efforts to seek and assess relatives as placement resources, although this is mandated in State policy.

Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

Well Being Outcome 1 incorporates four indicators. One pertains to agency efforts to ensure that the service needs of children, parents, and foster parents are assessed and that necessary services are provided to meet identified needs (Item 17). A second indicator assesses agency effectiveness with regard to actively involving parents and children (when appropriate) in the case planning process (Item 18). The two remaining indicators examine the frequency and quality of caseworker contacts with the children in their caseloads (Item 19) and the children's parents (Item 20).

Virginia did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved in 66 percent of the cases reviewed, which is less than the 90 percent required for a determination of substantial conformity.

Performance with regard to achieving Well-Being Outcome 1 varied across CFSR sites. The outcome was determined to be substantially achieved in 83 percent of Fairfax County cases, compared to 53 percent of Norfolk City cases and 50 percent of Bedford County cases.

The CFSR case reviews revealed that DSS was not consistent in its efforts to (1) assess needs and provide services to children, parents, and foster parents; (2) involve children (when age appropriate) and parents in case planning; and (3) establish face-to-face contact with children and their parents that is of sufficient frequency and quality to ensure children's safety and/or promote attainment of case goals.

Well Being Outcome 2: Children receive appropriate services to meet their educational needs.

The one indicator for Well Being Outcome 2 pertains to agency efforts to assess and address children's educational needs (Item 21).

Virginia achieved substantial conformity with Well-Being Outcome 2. The CFSR found that DSS makes concerted efforts to assess children's educational needs and provide appropriate services to meet those needs. Stakeholders cited a number of agency practices and community collaborations that contribute to the agency's success in meeting children's educational needs.

Well Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

This outcome incorporates two indicators. One assesses agency efforts to meet children's physical health needs (Item 22), and the other assesses agency efforts to address children's mental health needs (Item 23).

Virginia did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 83.7 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 95 percent of Fairfax County cases and 83 percent of Bedford County cases, compared to 64 percent of Norfolk City cases.

CFSR case reviews found that DSS made concerted efforts to meet the physical health needs of children in both the foster care and in-home services cases. However, the case reviews also found that DSS was less consistent in its efforts to meet children's mental health needs for both types of cases.

II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS

Statewide Information System

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care (Item 24).

Virginia is in substantial conformity with this factor. The CFSR determined that the State's information system, OASIS, meets these requirements.

Case Review System

Five indicators are used to assess the State's performance with regard to the systemic factor of Case Review System. The indicators examine the development of case plans and the involvement of parents in the case planning process (Item 25), the consistency and timeliness of six-month case reviews (Item 26) and 12-month permanency hearings (Item 27), the implementation of procedures to seek TPR in accordance with the timeframes established by ASFA (Item 28), and notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (Item 29).

The State is not in substantial conformity with the systemic factor of Case Review System. The CFSR determined the following: (1) children and parents are not consistently involved in case planning; (2) the federally required review of the status of each child in foster care at least once every six months is not occurring in a timely manner on a consistent basis; (3) the process for providing for TPR in accordance with the provisions of ASFA is not being implemented consistently; and (4) foster parents, preadoptive parents, and relative caregivers of children in foster care are not consistently notified of, nor have an opportunity to be heard in, all reviews and hearings held with respect to the child in their care.

Despite these concerns, the CFSR found that the State makes concerted efforts to ensure that every child in foster care has a permanency hearing in court no later than 12 months from the date the child is considered to have entered foster care and no less frequently than every 12 months thereafter.

Quality Assurance System

The State's performance with regard to the systemic factor of Quality Assurance is based on whether the State has developed standards to ensure the safety and health of children in foster care (Item 30) and whether the State is operating a statewide quality assurance system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (Item 31).

Virginia is in substantial conformity with the systemic factor of Quality Assurance System. The CFSR found that the State has developed and implemented standards to ensure that children in foster care are provided with quality services that protect their health and safety, and that the State is operating a quality assurance system that evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented.

Training

The systemic factor of Training incorporates an assessment of the State's new worker training program (Item 32), ongoing training efforts for child welfare agency staff (Item 33), and training for foster and adoptive parents (Item 34).

Virginia did not achieve substantial conformity with the systemic factor of Training. The CFSR determined that the State does not provide initial training for all agency personnel who deliver services under titles IV-B and IV-E statewide. Further, ongoing training for staff to address the skills and knowledge needed to carry out their duties is not provided in a consistent manner across the State. While there is an orientation requirement, there is no statewide mandated training for current or prospective foster parents and adoptive parents.

Service Array

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have an array of services that meets the needs of children and families served by the child welfare agency (Item 35)? (2) Are these services accessible to families and children throughout the State (Item 36)? (3) Can services be individualized to meet the unique needs of the children and families served by the child welfare agency (Item 37)?

Virginia did not achieve substantial conformity with the systemic factor of Service Array. The CFSR found that although the State has services available for children and families, there are critical gaps in services that address the needs of families, help create a safe home environment for children, enable children to remain safely with their parents when reasonable, and help children in foster placements achieve permanency. In addition, some services to assist children and families are not accessible in all political jurisdictions of the State. However, the CFSR found that DSS has the capacity to individualize services to meet the needs of children and families through flexible funding opportunities.

Agency Responsiveness to the Community

The systemic factor of Agency Responsiveness to the Community incorporates the extent of the State's consultation with external stakeholders in developing the Child and Family Services Plan (Items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally assisted programs serving the same population (Item 40).

Virginia is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. The CFSR found that DSS engages consumers, service providers, foster care providers, juvenile court, and other public and private child and family services agencies in ongoing consultation regarding the goals and objectives of the State's Child and Family Services Plan. The CFSR also determined that DSS coordinates services provided under the Child and Family Services Plan with services and benefits of other Federal or federally assisted programs serving the same populations.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (Items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (Item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (Item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children (Item 45).

Virginia did not achieve substantial conformity with this systemic factor. The CFSR determined that the State's standards for foster family homes and child care institutions have not been adequately updated in a timely manner. Also, the established standards are not applied equally to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds. Specific concerns raised regarding licensure were the following: (1) the State does not monitor adherence to standards in a routine or consistent manner; and (2) the State does not require mandated training for foster and adoptive parents prior to the placement of children in their homes. The CFSR also found that the State does not have recruitment procedures to ensure the diligent recruitment of foster and adoptive families that reflect the ethnic and racial diversity of the children in the State's foster care system.

The CFSR found that the State is effective in conducting criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate the timely adoptive and permanent placement of waiting children both between localities and with other States. While the State has identified barriers that affect the timely adoption and permanent placement of waiting children across localities and States, it has implemented a variety of initiatives to address these cross-jurisdictional barriers to permanency.

Table 1. CFSR Ratings for Safety and Permanency Outcomes and Items for Virginia

Outcomes and Indicators	Outcome Ratings			Item Ratings		
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards?</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Safety Outcome 1-Children are first and foremost, protected from abuse and neglect	No	85.0	Yes			
Item 1: Timeliness of investigations				ANI	74	
Item 2: Repeat maltreatment				Strength	95	Yes
Safety Outcome 2 - Children are safely maintained in their homes when possible and appropriate	No	81.3				
Item 3: Services to prevent removal				Strength	88	
Item 4: Risk of harm				ANI	81	
Permanency Outcome 1- Children have permanency and stability in their living situations	No	37.0	1 met, 3 not met			
Item 5: Foster care re-entry				Strength	98	Yes
Item 6: Stability of foster care placements				ANI	63	No
Item 7: Permanency goal for child				ANI	81	
Item 8: Reunification, guardianship and placement with relatives				ANI	67	No
Item 9: Adoption				ANI	18	No
Item 10: Other planned living arrangement				Strength	88	
Permanency Outcome 2 - The continuity of family relationships and connections is preserved	No	70.3				
Item 11: Proximity of placement				Strength	94	
Item 12: Placement with siblings				Strength	86	
Item 13: Visiting with parents and siblings in foster care				ANI	67	
Item 14: Preserving connections				ANI	77	
Item 15: Relative placement				ANI	74	
Item 16: Relationship of child in care with parents				ANI	67	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI).

Table 2. CFSR Ratings for Child and Family Well Being Outcomes and Items for Virginia

Outcomes and Indicators	Outcome Ratings		Item Ratings			
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Well Being Outcome 1 – Families have enhanced capacity to provide for children's needs	No	66.0				
Item 17: Needs/services of child, parents, and foster parents				ANI	74	
Item 18: Child/family involvement in case planning				ANI	69	
Item 19: Worker visits with child				ANI	76	
Item 20: Worker visits with parents				ANI	77	
Well Being Outcome 2 – Children receive services to meet their educational needs	Yes	92.3				
Item 21: Educational needs of child				Strength	92	
Well Being Outcome 3 – Children receive services to meet their physical and mental health needs are met	No	83.7				
Item 22: Physical health of child				Strength	95	
Item 23: Mental health of child				ANI	81	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI).

Table 3: Virginia's Performance on the Six Outcome Measures for Which National Standards Have Been Established (2001 data)

Outcome Measure	National Standard	Virginia Data
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	3.8%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	0.57% or less	0.34%
Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode?	8.6% or less	3.6%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	73.6%
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	17.9%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	84.8%

Table 4: CFSR Ratings for the Seven Systemic Factors for Virginia

Systemic Factors	In Substantial Conformity?*	Rating
IV. Statewide Information System	Yes (3)	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
V. Case Review System	No (2)	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		ANI
Item 27: Process for 12-month permanency hearings		Strength
Item 28: Process for seeking TPR in accordance with ASFA		ANI
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
VI. Quality Assurance System	Yes (3)	
Item 30: Standards to ensure quality services and ensure children's safety and health		Strength
Item 31: Identifiable QA system that evaluates the quality of services and improvements		Strength
VII. Training	No (1)	
Item 32: Provision of initial staff training		ANI
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		ANI
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		ANI
VIII. Service Array	No (2)	
Item 35: Availability of array of critical services		ANI
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		Strength
IX. Agency Responsiveness to the Community	Yes (4)	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		Strength
Item 40: Coordinates services with other Federal programs		Strength
X. Foster and Adoptive Parent Licensing, Recruitment and Retention	No (2)	
Item 41: Standards for foster family and child care institutions		ANI
Item 42: Standards are applied equally to all foster family and child care institutions		ANI
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children's racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

*Systemic factors are rated on a scale from 1 to 4. A rating of 1 or 2 indicates "Not in Substantial Conformity." A rating of 3 or 4 indicates Substantial Conformity.

** Individual items may be rated either as a Strength or as an Area Needing Improvement (ANI).